

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

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Chapter 11

In re:

**KIMO TILE @ MARBLE, LLC d/b/a
KIMO TILE & MARBLE, LLC,**

Debtor.

Case No. 24-20009 (JNP)

Adv. No. 25-01226 (JNP)

Hearing Date: July 22, 2025

**KIMO TILE @ MARBLE, LLC d/b/a
KIMO TILE & MARBLE, LLC**

Plaintiff,

v.

**TILE SETTERS AND TILE FINISHERS
UNION OF NEW YORK AND NEW
JERSEY, LOCAL NO. 7 OF THE
INTERNATIONAL BRICKLAYERS
AND ALLIED CRAFTWORKERS; and
BRICKLAYERS AND ALLIED
CRAFTWORKERS LOCAL 1 PA/DE,**

Defendants.

MOTION TO DISMISS

Defendant Bricklayers and Allied Craftworkers Local 1 PA/DE, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 12(b) and Federal Rules of Bankruptcy Procedure 8013, hereby moves the Court to dismiss the Complaint against it for lack of subject-matter jurisdiction and failure to state a claim. A Memorandum of Points and Authorities and a proposed Order are submitted in further support of this Motion.

Respectfully submitted,

Dated: June 27, 2025

/s/ Daniel J. Keenan

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